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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,) 2:13-CR-439-KJD-(VCF)
13 Plaintiff,)
14 v.) United States of America's Unopposed
15 ANTHONY B. BRANDEL, and) Motion to Extend Time to File its Replies to
JAMES WARRAS,) the Responses (ECF Nos. 311, 312, 314, and
16) 315) to the Motions Regarding Restitution
Defendants.) and Forfeiture (ECF Nos. 296-298)
17) (First Request)

18 The United States of America respectfully moves this Court for an Order extending the
19 time for the United States to file its replies to the responses (ECF Nos. 311, 312, 314, and 315) to
20 the motions (ECF Nos. 296-298) regarding restitution and forfeiture. This motion is the first request
21 for an extension of time to file the replies because of the necessary legal researching for the replies,
22 the interviewing of witnesses, the obtaining of declarations, and the obtaining evidence from the
23 victims and witnesses, who did not testify at trial, have taken longer than anticipated in addition to
24 the already full workloads. The deadline for filing the replies is November 4, 2016. The United
25 States requests a two-week extension of the schedule as follows: Replies due November 18, 2016;
26 and the hearing remaining December 6, 2016.

The grounds for extending the time are as follows.

Raquel Lazo and Kathleen Bliss, counsel for James Warras (Warras) and Anthony Brandel (Brandel) respectively, were contacted on November 2, 2016, and agreed to the extension of time.

Undersigned counsels have large case loads and have been unable to complete the replies with the interviews, declarations, and additional evidence.

The Motions for Entry of Forfeiture and Restitution were filed September 14, 2016 (ECF Nos. 296-298). Warras filed his response October 12, 2016 (ECF Nos. 311 and 312). Brandel filed his Responses October 21, 2016 (ECF Nos. 314 and 315). Motions for Joinder were filed on October 21 and 24, 2016, to link the co-defendant's responses (ECF Nos. 316-319).

This Motion is not submitted solely for the purpose of delay or for any other improper purpose.

This Court should grant an extension of time to, and including, November 18, 2016..

DATED this 3rd day of November, 2016.

DANIEL G. BOGDEN
United States Attorney

/s/ Daniel D. Hollingsworth
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

/s/ Mark E. Woolf
MARK E. WOOLF
Assistant United States Attorney

IT IS SO ORDERED:

Bernard

UNITED STATES DISTRICT JUDGE

DATED: April 3, 2017 nunc pro tunc